

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA

COPAC, INC.,

Plaintiff,

vs.

TRANSPERFECT, INC.,

Defendant.

C/A No. 7:11-cv-01392-TMC

**AGREED MOTION FOR PROTECTIVE
ORDER AND COMBINED SUPPORTING
MEMORANDUM**

Plaintiff COPAC, Inc. and Defendant Transperfect, Inc., by and through their undersigned attorneys, hereby move the Court to enter the Agreed Protective Order previously submitted by these parties.

This motion is made on the ground that discovery in this case could touch on commercially sensitive trade secret and other confidential information. While the parties recognize the need for discovery to address the issues in this case, neither party wants its confidential information shared with third parties or made publicly available. To appropriately balance the need for discovery while also protecting the parties' interests with regard to nondisclosure, the parties have agreed to a protective order which they have submitted to the Court. Protective orders are routinely entered in commercial cases, and the parties hereby move that the Court enter their agreed order.

Respectfully submitted,

THE WARD LAW FIRM, P.A.

By /s/John E. Rogers
John E. Rogers, II, Federal ID #: 10,014
P.O. Box 5663
233 S. Pine Street
Spartanburg, SC 29304
864-591-2366
864-585-3090 (fax)
Email: jrogers@wardfirm.com
Attorneys for Plaintiff

HAYNSWORTH SINKLER BOYD, P.A.

By /s/ Moffatt G. McDonald
Moffatt G. McDonald, #2805
mmcdonald@hsblawfirm.com
75 Beattie Place, 11th Floor
P.O. Box 2048
Greenville, SC 29602
(864) 240-3200
(864) 240-3300 (fax)

David E. Spalten
Kelly S. Johnson
Kasowitz, Benson, Torres & Friedman LLP
1360 Peachtree Street, NE, Suite 1150
Atlanta, Georgia 30309

Attorneys for the Defendant TransPerfect, Inc.

April 2, 2012